



New Lisbon Broadband Communications
6369 East Dublin Pike
New Lisbon, IN 47366

NOTICE OF EX PARTE

April 30, 2020

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 17-97: *Call Authentication Trust Anchor*
WC Docket No. 20-67: *Implementation of TRACED Act Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources*

Dear Ms. Dortch:

New Lisbon Telephone Company, founded in 1901, is an ILEC serving approximately 300 voice customers in a sixty square mile area of eastern Indiana. Our company deployed the first Nortel C15 switch, SIP enabled, in the US in 2006.

We strongly support the Commission's efforts to restore trust in the public telephone network and believe that ubiquitous support of SHAKEN by all service providers is the only way to stop the criminals who spoof calling numbers, abuse our network and harass our subscribers.

Our network has been end-to-end SIP enabled for many years and we are ready to comply with the TRACED Act immediately. Unfortunately, we are excluded from the benefits of SHAKEN since we have no practical options for interconnecting with the Public Switched Telephone Network using SIP technology. This is because all our local, inbound long distance and outbound long-distance traffic (PIC'ed to other carriers) is routed through our local tandem providers, who are large national telecommunications providers. These providers have no plans to offer SIP interconnection from their local tandems to our existing meet points.

One of the tandem providers will provide us with a tandem SIP interconnect in Indianapolis, but the estimated cost of this circuit is \$2,000 per month, plus additional upfront costs for cross connects, equipment, etc. In addition, we would need to license a new SHAKEN feature from our switch vendor at a cost of at least \$55,000 up front plus annual support fees.

Unfortunately, we will see virtually no benefit from these expenses since the majority of our interconnected traffic is with local TDM networks that cannot support SHAKEN. Also, this option is only offered by one of the large tandem providers in our region. So as of now, we have no viable options to support SHAKEN and we do not foresee any call authentication mechanisms for TDM signaling that can match the effectiveness of SHAKEN.

We understand that the Commission is considering giving smaller carriers until 2022 to support SHAKEN. We appreciate the consideration, but we do not think this delay is helpful, since there will be no future network upgrades with our tandem providers. Subscribers of small

Marlene H. Dortch

April 21, 2020

Page 2 of 2

carriers need the same call authentication protection as those of the larger wireline and cellular carriers. Delaying implementation of SHAKEN until 2022 will not solve the fundamental problem—small carriers cannot gain access to the public telephone network via SIP. In addition, delaying the participation of smaller carriers in the SHAKEN trust network raises the risk of reverse rural call completion. Calls from smaller carriers will not get answered since they cannot be SHAKEN verified.

We believe that equal access to the SHAKEN trust network and compliance of the TRACED act by June 2021 will only be achieved if one or more the following changes occur:

1) All local tandem providers offer SIP interconnection at the existing interconnect points.

2) The cost burden for inter-LATA transport to reach a distant SIP interconnect to the PSTN is not placed on local telephone service providers.

3) Out-of-Band SHAKEN is widely deployed as an option for TDM interconnections that will not be upgraded. This technology is identical to in-band SHAKEN except the SHAKEN trust token is transmitted outside the SIP signaling. This technique enables SHAKEN to be deployed with existing switch and network infrastructure quickly and at a much lower cost. If Out-of-Band SHAKEN were an option, we could comply with the TRACED at a cost of \$500 per month.

New Lisbon was an early adopter of SIP and we want to be an early adopter of SHAKEN. I hope the Commission will create policies to encourage the changes I have listed above.

Respectfully submitted,

/s/ John Greene

John Greene
CEO and General Manager
New Lisbon Telephone Company and
New Lisbon Broadband Communications